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Attorneys for Sonos, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

GOOGLE LLC,
Plaintiff and Counterdefendant,

v.

SONOS, INC.,
Defendant and Counterclaimant.

Case No. 3:20-cv-06754-WHA
Related to Case No. 3:21-cv-07559-WHA

**DECLARATION OF RORY SHEA IN
SUPPORT OF SONOS, INC.'S BRIEF
REGARDING PRIORITY DATE AND
WRITTEN DESCRIPTION**

Date: March 9, 2023
Time: 8:00 a.m.
Place: Courtroom 12, 19th Floor
Judge: Hon. William Alsup

Complaint Filed: September 28, 2020

1 I, Cole Richter, declare as follows and would so testify under oath if called upon to do so:

2 1. I am an attorney with the law firm of Lee, Sullivan, Shea & Smith, LLP, counsel
3 of record to Sonos, Inc. (“Sonos”) in the above-captioned matter. I am a member in good
4 standing of the Bar of the State of Illinois. I make this declaration based on my personal
5 knowledge, unless otherwise noted. If called, I can and will testify competently to the matters set
6 forth herein.

7 2. I make this declaration in support of Sonos, Inc.’s Opposition To Google’s Motion
8 To Strike Expert Reports.

9 3. Attached as **Exhibit 1** is a true and correct copy of U.S. App. No. 60/825,407
10 (2006 provisional application). This exhibit has been highlighted for convenience.

11 4. Attached as **Exhibit 2** is a true and correct copy of excerpts from U.S. App. No.
12 11/853,790 (2007 application). This exhibit has been highlighted for convenience.

13 5. Attached as **Exhibit 3** is a true and correct copy of U.S. Patent No. 10,848,885
14 (TX0003).

15 6. Attached as **Exhibit 4** is a true and correct copy of U.S. Patent No. 10,469,966
16 (TX0001).

17 7. Attached as **Exhibit 5** is a true and correct copy of U.S. Patent No. 8,483,853
18 (TX6667).

19 8. Attached as **Exhibit 6** is a true and correct copy of excerpts from U.S. App. No.
20 13/896,829 (May 2013 application). This exhibit has been highlighted for convenience.

21 9. Attached as **Exhibit 7** is a true and correct copy of U.S. Patent No. 8,843,228
22 (TX6668).

23 10. Attached as **Exhibit 8** is a true and correct copy of excerpts from U.S. App. No.
24 14/465,457 (August 2014 application). This exhibit has been highlighted for convenience.

25 11. Attached as **Exhibit 9** is a true and correct copy of U.S. Patent No. 9,344,206
26 (TX6669).

27 12. Attached as **Exhibit 10** is a true and correct copy of excerpts from U.S. App. No.
28 15/130,919 (2016 application). This exhibit has been highlighted for convenience.

1 13. Attached as **Exhibit 11** is a true and correct copy of the Nov, 18, 2019 Response
2 to Office Action from the 2016 application. This exhibit has been highlighted for convenience.

3 14. Attached as **Exhibit 12** is a true and correct copy of the Aug 23, 2019 Response to
4 Office Action from the '885 application. This exhibit has been highlighted for convenience.

5 15. Attached as **Exhibit 13** is a true and correct copy of the Aug 23, 2019 Response to
6 Office Action from the '966 application. This exhibit has been highlighted for convenience.

7 16. Attached as **Exhibit 14** is a true and correct copy of June 4, 2019 Preliminary
8 Amendment from the May 2019 application. This exhibit has been highlighted for convenience.

9 17. Attached as **Exhibit 15** is a true and correct copy of U.S. Patent No. 11,388,532
10 (TX7213).

11 18. Attached as **Exhibit 16** is a true and correct copy of file history excerpts from U.S.
12 App. No. 16/383,561 (885 application). This exhibit has been highlighted for convenience.

13 19. Attached as **Exhibit 17** is a true and correct copy of file history excerpts from U.S.
14 App. No. 16/383,565 (966 application). This exhibit has been highlighted for convenience.

15 20. Attached as **Exhibit 18** is a true and correct copy of excerpts from U.S. App. No.
16 16/422,160 (May 2019 application). This exhibit has been highlighted for convenience.

17 21. Attached as **Exhibit 19** is a true and correct copy of U.S. Patent No. 10,897,679.

18 22. Attached as **Exhibit 20** is a true and correct copy of excerpts of the deposition of
19 Tim Kowalski taken on May 8, 2023.

20 23. Attached as **Exhibit 21** is a true and correct copy of Sonos UI Specification: Zone
21 Scenes (TX6545).

22 24. Attached as **Exhibit 22** is a true and correct copy of the Sonos User Guide (2005)
23 (TX6991).

24 25. Attached as **Exhibit 23** is a true and correct copy of excerpts from the 2016
25 application File History. This exhibit has been highlighted for convenience.

26 26. Attached as **Exhibit 24** is a true and correct copy of excerpts from the 2016
27 application File History. This exhibit has been highlighted for convenience.
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1 27. Attached as **Exhibit 25** is a true and correct copy of the September 19, 2019
2 Correction Response from the '885 application. This exhibit has been highlighted for
3 convenience.

4 28. Attached as **Exhibit 26** is a true and correct copy of the September 23, 2019
5 Correction Response from the '966 application. This exhibit has been highlighted for
6 convenience.

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8 I declare under penalty of perjury that the foregoing is true and correct to the best of my
9 knowledge. Executed this 14th day of May, 2023 in San Francisco, California.

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12 Rory Shea
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